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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

RACHEL G. DAMIANO and KATIE S.  
MEDART,

Case No. 1:21-cv-00859-CL

Plaintiffs,

v.

GRANTS PASS SCHOOL DISTRICT 7, an Oregon public body; THE MEMBERS OF THE BOARD OF EDUCATION OF GRANTS PASS SCHOOL DISTRICT 7 – Scott Nelson, Cliff Kuhlman, Gary Richardson, Debbie Brownell, Cassie Wilkins, Brian Delagrange, and Casey Durbin – in their official and personal capacities; KIRK T. KOLB, Superintendent, Grants Pass School District 7, in his official and personal capacity; and THOMAS M. BLANCHARD, Principal, North Middle School, Grants Pass School District 7, in his official and personal capacity,

Defendants.

DECLARATION OF KAREN M. VICKERS IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

I, KAREN M. VICKERS, declare:

1. I am one of the attorneys of defendants Grants Pass School District No. 7, Kirk Kolb, Thomas M. Blanchard, Scott Nelson, Debbie Brownell, and Brian De La Grange. I make this declaration based on personal knowledge and am competent to testify as to the matters stated

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herein.

2. Attached hereto as Exhibit 1 is an excerpt and exhibits from the deposition of plaintiff Rachel Sager provided to me by certified court reporters Veritext.

3. Attached hereto as Exhibit 2 is an excerpt and exhibits from the deposition of plaintiff Katie Medart provided to me by certified court reporters Veritext.

4. Attached hereto as Exhibit 3 is a copy of an excerpt of an interview of Rachel Damiano. This document was produced to me by plaintiffs in response to defendants' request for production.

5. Attached hereto as Exhibit 4 is a copy of an excerpt of an interview of Katie Medart. This document was produced by plaintiffs in response to defendants' request for production.

6. Attached hereto as Exhibit 5 is an excerpt and exhibits from the deposition of Kirk Kolb provided by certified court reporters Naegeli.

7. Attached hereto as Exhibit 6 is an excerpt and exhibits from the deposition of Sherryl Ely provided to me by certified court reporters Naegeli.

8. Attached hereto as Exhibit 7 is an excerpt and exhibits from the deposition of Tanika Cooks provided to me by certified court reporters Naegeli.

9. Attached hereto as Exhibit 8 is a redacted copy of an Investigation Report. This document was produced by defendants in response to plaintiffs' request for production.

8. Attached hereto as Exhibit 8 is a redacted copy of an Investigation Report. This document was produced by defendants in response to plaintiffs' request for production.

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I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: August 1, 2022.

VICKERS PLASS LLC

*s/ Karen M. Vickers*  
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